



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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BUTCH TONGATE
Cabinet Secretary

BRUCE YURDIN
Acting Deputy
Secretary

Certified Mail – Return Receipt Requested

December 17, 2018

Mr. John D. Lovenburg, Vice President, Environmental
BNSF Railway Company
Principal Office
2650 Lou Menk Drive
Fort Worth, TX 76131

**Re: BNSF Railway Company / Belen Yard; MSGP; SIC 4011; NPDES Compliance Evaluation
Inspection (CEI); NPDES Tracking No. NMR053334; November 14 & 15, 2018**

Dear Mr. Lovenburg,

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, Texas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Robert Houston, Section Chief
NPDES Enforcement Stormwater
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WS)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Erin Trujillo at 505-827-0418 or at erin.trujillo@state.nm.us.

Mr. Lovenburg, BNSF, Belen Yard, NMR053334

December 17 , 2018

Page 2 of 2

Sincerely,

/s/Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
Robert Houston, USEPA (6EN-WS)
Darlene Whittten-Hill, USEPA (6EN) by e-mail
John Rhoderick, NMED District I by e-mail
Kate Herrell, NMED GWQB by e-mail
Domonic Lees, Manager, Environmental Operations, BNSF Railway Company by e-mail



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="R"/> 0 <input type="text" value="5"/> 3 <input type="text" value="3"/> 3 <input type="text" value="4"/> 11 12 <input type="text" value="1"/> <input type="text" value="8"/> 1 <input type="text" value="1"/> 1 <input type="text" value="4"/> 17 18 <input type="text" value="~"/>				19 <input type="text" value="S"/> 20 <input type="text" value="2"/>	
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Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 69	70 <input type="text" value="2"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	74 75 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date ~0945 hours / 11/14/2018 ~0950 hours / 11/15/2018	Permit Effective Date 2015 MSGP Effective August 12, 2015
BNSF Railway Company, Belen Yard, 106 North First Street, Belen, NM 87002. Valencia County	Exit Time/Date ~1515 hours / 11/14/2018 ~1615 hours / 11/15/2018	Permit Expiration Date 2015 MSGP Expires June 4, 2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) -Jason R. Ornelas, Gen. Foreman III, BNSF Railway Company / 505-593-7200 -Todd Graham, Mechanical Foreman II, Facilities Manager, BNSF Railway Company -Domonic Lees, Manager, Environmental Operations, BNSF Railway Company / 505-767-6908 -Carly Qualler, Environmental Resources Management, Albuquerque / 505-235-5944 -Robert Stewart, Proj. Manager, Environmental Resources Management, Albuquerque / 505-318-2634	Other Facility Data Entrance Latitude: 34,6607° Longitude: -106.7674° SIC 4011 / NAICS 482111 / MSGP Sector P / Rail Transportation Facilities	
Name, Address of Responsible Official/Title/Phone and Fax Number John D. Lovenburg, Vice President, Environmental / BNSF Railway Company, Principal Office, 2650 Lou Menk Drive, Fort Worth, TX 76131 / 817-352-1459	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. See attached report and further explanations.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo /s/Erin S. Trujillo	Agency/Office/Telephone/Fax NMED / SWQB / 505-827-0418	Date 12/14/2018
Signature of Management QA Reviewer Jennifer Foote /s/Jennifer Foote	Agency/Office/Phone and Fax Numbers NMED / SWQB / 505-827-0596	Date 12/14/2018

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information		General	
Inspection Type	Compliance Evaluation Inspection	Inspector Name	Erin S. Trujillo
NPDES ID Number	NMR053334	Telephone	505-827-0418
Inspection Date	11/14 & 11/15/2018	Entry Time	~0945 hours 11/14/2018 ~0950 hours 11/15/2018
Inspector Type (circle one)	EPA State EPA Oversight	Exit Time	~1515 hours 11/14/2018 ~1615 hours 11/15/2018
Facility Sector/ SIC/Activity Code	Sector P (Land Transportation) / SIC 4011 Railroad Transportation (Line-Haul Operating) / NAICS 482111 (Line-Haul Railroads)	Signature	/s/Erin S. Trujillo

Facility Location Information			
Name/Location/ Mailing Address	BNSF Railway Company, Belen Yard 106 North First Street, Belen, NM 87002		
GPS Coordinates	Latitude	34.6607	Longitude -106.7674
Receiving Water(s)	Stormwater from industrial activity areas, including immediate access roads, is both conveyed by on-site storm sewers directly into Santa Fe Ditch, thence to Sanchez Interior Drain, thence to Bosque Drain, thence approximately 8 miles to Rio Grande; and may enter New Belen Wasteway, thence approximately 1.5 miles to Rio Grande; in Segment 20.6.4.101 NMAC in the Rio Grande Basin.		

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	BNSF Railway Company, 2650 Lou Menk Drive, Fort Worth, TX 76131 / Owner /Operator	505-864-5176
Facility Contact	Mr. Domonic Lees Manager Environmental Operation	505-767-6908
Authorized Official(s)	Mr. John D. Lovenburg, Vice President, Environmental, BNSF Railway Company	817-352-1459

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/>	N	SWPPP Prepared & Available	<input checked="" type="checkbox"/>	N
Permit Type	General	Individual	SWPPP Contents Satisfactory	Y	N
Operational Date	Prior to 1990	Active 01/16/2016	SWPPP Implementation Satisfactory	Y	N
NOI/Application Date	Submitted 12/17/2015		SWPPP Date		08/29/2017
If applicable, is no exposure certification on file?	Not Applicable		Intentionally left blank		

NPDES Industrial Storm Water Checklist (MSGP)

Inspection Summary

On November 14 and 15, 2018, an announced National Pollutant Discharge Elimination System (NPDES) Compliance Evaluation Inspection (CEI) was conducted by Erin S. Trujillo of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB), accompanied by Kate Herrell, NMED Ground Water Quality Bureau (GWQB), at the BNSF Railway Company, Belen Yard, 106 North First Street, Belen, New Mexico 87002 in Valencia County.

Upon arrival at the facility at approximately 0945 hours on November 14, 2018, Ms. Trujillo made introductions, presented credentials, and discussed the purpose of the NPDES CEI with Jason R. Ornelas, General Foreman III, Mechanical, BNSF Railway Company. Ms. Trujillo; Ms. Herrell; Todd Graham, Mechanical Foreman II, Facilities Manager, BNSF Railway Company; and Carly M. Qualler, Environmental Resources Management, Albuquerque toured the facility on November 14, 2018. Ms. Trujillo; Ms. Herrell; Mr. Graham; Robert K. Stewart, Project Manager, Environmental Resources Management, Albuquerque; and Domonic Lees, Manager, Environmental Operations, BNSF Railway Company continued to tour the facility on November 15, 2018. Ms. Trujillo conducted an exit interview on site on November 15, 2018 with Mr. Lees prior to Ms. Trujillo and Ms. Herrell leaving the facility at approximately 1615 hours on November 15, 2018. Ms. Trujillo conducted a follow up interview with Mr. Lees by telephone on December 7, 2018.

NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA) each year. This report is based on review of files maintained by the permittee and NMED, on-site observation by NMED personnel, and verbal and additional information provided by the Permittee's representatives.

Industrial Stormwater Discharge Regulations / Multi-Sector General Permit (MSGP) Summary

United States Environmental Protection Agency (USEPA) Phase I stormwater program was promulgated in 1990 under the federal Clean Water Act (CWA). Federal regulations at 40 CFR 122.26(b)(14)(i)-(xi) require stormwater discharges associated with specific categories of industrial activity to be covered under a NPDES permit (unless otherwise excluded). In 40 CFR 122.26(b)(14), *"Storm water discharge associated with industrial activity...For the categories of industries identified in this section, the term includes, but is not limited to, storm water discharges from...immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility."* The term stormwater discharge *"excludes areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with storm water drained from the above described areas."* The 11 categories of regulated industrial activities include Category Eight (viii) transportation facilities with vehicle maintenance shops and equipment cleaning operations. Only those portions of the facility that are either involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, airport deicing operations, or which are otherwise identified under paragraphs (b)(14) (i)-(vii) or (ix)-(xi) are associated with industrial activity. Information on USEPA's Industrial Stormwater Multi-Sector General Permit (MSGP) permit is available at <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities>. USEPA MSGP includes, among other things, eligibility requirements, preparation of a Stormwater Pollution Prevention Plan (SWPPP), inspections, monitoring and reporting.

Facility Background/Summary

The railroad was established in Belen in the late 1800's. BNSF Railway Company, created through a September 22, 1995 merger of Burlington Northern Inc. and Santa Fe Pacific Corporation, is listed in State of New Mexico Secretary of State on-line corporation search as a Foreign Profit Corporation in the State of Delaware filing date December 30, 1982 (Source: <http://www.sos.state.nm.us>). The Belen Railyard was previously covered under the 2000 MSGP (expired tracking number NMR05B148 submitted January 18, 2001 by Burlington Northern & Santa Fe) and 2008 MSGP (expired Tracking Number NMR05GP81 submitted October 8, 2009 by BNSF Railway Company). Industrial activity, including fueling, maintenance, cleaning and washdown exists within an estimated 139-acre portion of the facility that includes access roads immediately adjacent to fuel, chemical and material storage and vessels from approximately BNSF MP 895.5 to 897.5. West Bound and East Bound fueling facilities with associated maintenance, cleaning and storage are located in the northwest and southeast portion of the facility. ATV equipment maintenance and storage are located in the northeast portion of the site. Locomotive maintenance, roundhouse fueling facility, sand tower storage, rolling stock maintenance, sludge drying beds are

NPDES Industrial Storm Water Checklist (MSGP)

located in the central portion of the facility. Fueling of locomotives and some repairs may occur throughout the facility. Facility SWPPP Site Maps list over 30 above-ground storage tanks for diesel fuel, gasoline, red dye, lube oil, used oil range ranging from over 2.8 million gallons to 200 gallons

The facility is associated with two NMED Groundwater Quality Bureau (GWQB) Discharge Permits (DPs). GWQB DP-278 authorizes approximately 8,000 gallons per day (gpd) of industrial wastewater and stormwater discharged to an on-site treatment and disposal system including two(2) 1-million gallon evaporation ponds (lagoons). GWQB DP-1715 would authorize re-injection of up to 216,000 (gpd) groundwater containing light non-aqueous phase liquid (LNAPL) hydrocarbon contamination treated using granular activated carbon.

Stormwater Conveyance

The Middle Rio Grande Conservancy District (MRGCD) operates, maintains and manages irrigation, drainage, and river flood control in the Middle Rio Grande Valley. MRGCD 2014 Property Maps available at <https://www.mrgcd.com/mapping-gis.aspx> include were reviewed. MRGCD facilities Garcia Acequia exists west of industrial activity areas and Santa Fe Ditch exists east and within industrial activity areas of the facility. MRGCD property maps appear to show Garcia Acequia continuing to Feeder Ditch #3 approximately 5 miles south of the facility, then Feeder Ditch #3 continuing to Rio Grande. Mr. Sloan Washburn, Division Manager, MRGCD Belen Division Field Office was contacted by telephone to discuss the status and management practices of the Santa Fe Ditch. According to Mr. Washburn on December 12, 2018, MRGCD has not been conducting maintenance or clean out of Santa Fe Ditch thru to MRGCD right of way Caldwell Lateral due to diminished irrigation use and reduced irrigation water demand. MRGCD maps show the Santa Fe Ditch and Caldwell Lateral continuing south then east to Sanchez Interior Drain; Sanchez Interior Drain continuing to Bosque Drain; and Bosque Drain continuing to Rio Grande approximately 8 miles south of the facility. MRGCD facility New Belen Wasteway crosses underneath the railway lines south of fueling facilities in the southern portion of the facility. New Belen Wasteway continues to Rio Grande approximately 1.5 miles east-southeast of the facility.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/> Y	N	
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/> Y	N	
Copy of the permit language?	<input checked="" type="checkbox"/> Y	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	N	Not expired. See notes below for Endangered Species Act.
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> Routine facility inspection (3.1.1) Quarterly visual assessment (3.2.3) Benchmark monitoring (6.2.1.3). 	Y	N	Not applicable
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input checked="" type="checkbox"/> Y	N	Permittee representatives provided Spill Prevention, Control, and Countermeasure (SPCC) Plan, including Site Maps Final 05/19/2018
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/> N	N = Not kept with SWPPP. See notes below.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	Not applicable
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/> Y	N	
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	N	
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/>	N	
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/>	N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/>	N	<u>Comment:</u> Not all impervious surfaces were easy to discern in the aerial imagery due to the scale of the printed site maps.
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	<input checked="" type="checkbox"/>	SWPPP Site Maps did not indicate direction of surface flow, except for portions of ditch/swale. See notes below. SWPPP did not include Drainage Area Site Map (see Part 8.P.4.1 of the 2015 MSGP). See notes below.
Does the site map contain locations of all existing structural control measures?	Y	<input checked="" type="checkbox"/>	See notes below
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	N	See notes below / Federal CWA jurisdictional determination was not conducted <u>Additional Information:</u> SWPPP Site Maps indicated portions of ditch. Rio Grande with impairments and Total Maximum Daily Load (TMDL) is not in immediate vicinity. Facility General Location Map shows Rio Grande, but not impairments or TMDL.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/>	SWPPP Site Maps did not contain all or did not contain correctly labeled/symbols for all inlets, pipes, drains, irrigation, and ditch/swale. See notes below.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.2.3.2?	Y	<input checked="" type="checkbox"/>	SWPPP Site Maps did not contain location of stockpiled earthen material, sanitary dump stations, portable toilets
Does the site map contain locations where significant spills or leaks identified under Part 5.2.3.3 have occurred?	Y	<input checked="" type="checkbox"/>	Additional information and clarification in SWPPP appears needed. See notes below.
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/>	See notes below
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	<input checked="" type="checkbox"/>	See notes below
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	Not applicable
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	N = Not documented for allowable fire hydrant flushing/testing (see Part 1.1.3.1 of 2015 MSGP).

NPDES Industrial Storm Water Checklist (MSGP)

<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> Fueling stations Vehicle and equipment maintenance and/or cleaning areas Loading/unloading areas Locations used for the treatment, storage or disposal of wastes Liquid storage tanks Processing and storage areas Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility Transfer areas for substances in bulk Machinery 	Y	<input checked="" type="checkbox"/> N	<p>Y = Part 5.2.2 and 5.2.3 of 2015 MSGP.</p> <p>N = Not documented for fuel contractor storage areas for vehicle/equipment with actual or potential fluid leaks (see Part 8.P.4.1 of 2015 MSGP)</p>
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	N	Not applicable / none identified / none observed
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	<input checked="" type="checkbox"/> N	N = Not documented for allowable fire hydrant flushing/testing (see Part 1.1.3.1 of 2015 MSGP)
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	Y	<input checked="" type="checkbox"/> N	N = stockpiled earthen material, sanitary dump stations, portable toilets
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	<input checked="" type="checkbox"/> N	<p>Additional information / clarification appears needed in SWPPP. SWPPP states <i>"Significant spills, greater than 5 gallons within the last 3 years, that have occurred at the facility are identified in Table 5-4."</i> SWPPP stated "None Identified." SWPPP was annotated with spills on 7/5/2018 and 8/1/2018. SWPPP Map 7 of 7 states <i>"No Prior Release Locations Known At This Time."</i> See below for available spill information in NMED and National Spill Response (NRC) databases. BNSF reports/tracks information on spills from tank cars at the yard. In these cases, the spill may be in areas that are within or run-on to industrial activity areas of the facility. Regulated stormwater discharges include stormwater run-on that commingles with stormwater discharges associated with industrial activity at your facility (See Part 2.1 of the 2015 MGSP).</p>

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
<p>Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include:</p> <ul style="list-style-type: none"> Date Description of evaluation criteria List of the outfalls or onsite drainage points directly observed Different types of non-storm water discharges and source locations Actions taken such as a list of control measures for elimination. 	Y	<input checked="" type="checkbox"/> N	<p>N = Not documented for evaluation criteria, evaluation and/or list of control measures for fire hydrant flushing/testing discharge</p> <p><u>Additional Information:</u> Permittee representatives described that fire hydrant flushing/testing was conducted by on-site contractor. SPCC maps show/label hydrants, but SWPPP maps do not. Additional documentation or evaluation while conducting described fire hydrant flushing/testing may be needed to determine if there is allowable discharge or need for control measures for elimination.</p>
Does salt storage occur at this facility?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input checked="" type="checkbox"/> Y	N	
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	Y	<input checked="" type="checkbox"/> N	Engineering practices and manufacturer's specifications not documented (or referenced) in SWPPP for design and installation for control measures for Stockpiled Earthen Material, Stockpiled Earthen Material impacted by spills, dust control agents.
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input type="checkbox"/> N	Schedule described by on-site representatives, but not specified in SWPPP
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input type="checkbox"/> N	Schedule described by on-site representatives, but not specified in SWPPP
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	Y	<input type="checkbox"/> N	<p>Y = BNSF Employees</p> <p>N = Not documented for on-site contractors that conduct industrial activities and ensure compliance with MSGP.</p>
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	<input checked="" type="checkbox"/> N	Location of controls for areas described as "Throughout facility" in SWPPP is not specific and does not appear sufficient for unpaved roads, ditches, stockpiled earthen material, stockpiled earthen material impacted by spills, flow velocity, dust control agents (see Part 2.1.2.5 Erosion and Sediment Controls of 2015 MSGP).
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	<input checked="" type="checkbox"/> N	Y = paved areas, soil stabilization, retention ponds, low areas / infiltration areas N = stockpiled earthen material
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	<input checked="" type="checkbox"/> N	N = Location of control described as "Throughout facility" is not specific.
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	<input checked="" type="checkbox"/> Y	N	
Employee Training – is there a schedule for regular (at least annually) employee training?	Y	<input checked="" type="checkbox"/> N	Y = BNSF employees annually N = Not documented for on-site contractor employees
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	Y	<input checked="" type="checkbox"/> N	N = Not documented for on-site contractor employees (See Parts 2.1.2.8 and 8.P.3.2 of 2015 MSGP)
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	N	Described in SWPPP. See notes below on implementation.
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	N	Described in SWPPP. See notes below on implementation.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description

Notice of Intent (NOI)

- Facility's 2015 MSGP NOI was not submitted by September 2, 2015 which was the deadline for Operators of industrial activities that were authorized for coverage under the 2008 MSGP (see Table 1-2 of the 2015 MSGP). SWPPP did not contain documentation of USEPA notification of extension.
- Updates, clarifications and corrections to the NOI and/or SWPPP also appear needed, as follows:
 - Correct county (Valencia County not Curry County);
 - NOI indicates the acreage of facility is 110 acres, but SWPPP site maps indicated approximately 139 acres.
 - Update and/or clarify receiving waters. NOI indicates unnamed waterbody flowing into the Rio Grande. Named acequias, ditches and wasteways were discussed above.
 - Update impairment status
 - Outfall identification in NOI does not match SWPPP, including Site Maps, as discussed above.
 - NOI does not include a potential outfall at ditch/swale on SPCC Map 5 of 9.
 - NOI does not include a potential outfall at New Belen Wasteway
 - NOI does not include list of threatened or endangered species which was in SWPPP.

Additional Information: As discussed above, named MRGCD facilities continue to the Rio Grande from Rio Puerco to Isleta Pueblo Boundary, in NMED Assessment Unit (AU) NM-2105_40. The impairment for E.coli bacteria was removed (see USEPA Action on New Mexico 2016-2018 Section 303(d) List dated September 23, 2016, <https://www.env.nm.gov/swqb/303d-305b/2016-2018/documents/EPA2016-2018IRapprovalletterSept232016.pdf>). The Middle Rio Grande Watershed Total Maximum Daily Load (TMDL) from the San Marcial USGS gage to the Angostura Diversion, which includes the above referenced AU dated June 30, 2010 is still approved for E.coli bacteria. There is no Waste Load Allocation for MSGP permitted facilities for E.coli bacteria. There is no Temperature TMDL for the above-referenced AU at this time. NMED SWQB provides information on the Clean Water Act 303(d)/305(b) Integrated Report, TMDLs, sign up for receiving bureau notifications at the following website: <https://www.env.nm.gov/surface-water-quality/>.

Eligibility Documentation

Permittee's NOI states that Criterion C eligibility form was submitted to EPA on 8/28/2015. SWPPP did not include copy/transmittal of submittal to EPA. SWPPP included a October 7, 2016 species list from USFWS. Completed Criterion Selection Worksheet (see Part 1.1.4.5 and Part E.4 of Appendix E of 2015 MSGP) was not kept with SWPPP on day of this inspection. See Part 5.2.6.1 of the 2015 MSGP, "You must keep with your SWPPP the documentation supporting your determination with regard to Part 1.1.4.5 (Endangered and Threatened Species and Critical Habitat Protection)."

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Continued

SWPPP Site Map

Facility's SWPPP Site Map(s) did not contain some requirements in Part 5.2.2 (Site Description) and 8.4.4.1 (Drainage Area Site Map) of the 2015 MSGP as noted above. SPCC Maps dated 5/19/2018, which included arrows with the direction of surface flow in portions of the site, were reviewed for comparison. The following are examples of information that was not contained and/or discrepancies found on the two sets of maps:

- SWPPP maps did not show direction of surface flow. SPCC maps did not show direction of flow at all driveway or access road entrances and at MRGCD ditches or wasteways. Not all track culvert crossings with direction of flow were shown/labeled.
- SPCC Maps indicate (by color) all emergency generators, transformers and curve grease as industrial activity. However, not all would be associated with industrial activity covered by MSGP or consistent with industrial activity shown on SWPPP maps (e.g., Main Yard Office Building 1).
- SWPPP and SPCC maps did not contain an outlet/outfall labels consistent with NOI.
- Portions of the Santa Fe Ditch east of the 5.30-acre Car Inspector Building/Mechanical Building was not labeled on SWPPP Map 2 of 7.
- An observed drainage ditch/swale and inlet near the entrance to the 3.88-acre Depot area, north of the Industrial Activity West Bound Fueling Facility Rack/Area (FA1/FA3) were not shown/labeled on SWPPP Map 2 of 7. SPCC Map 2 of 9 shows direction of surface flow (by arrows) from the FA3 area toward the location of this ditch/swale inlet. SPCC Map 2 of 9 also did not show/label the inlet at the entrance to the Depot.
- SWPPP Maps 2 and 3 did not show/label drainage inlets and piping to lift station 7 continuing to Outfall 2. SPCC Map 3 of 9 did not appear / did not clearly show from scale of printed map piping continuing to Outfall 2.
- MRGCD facility Santa Fe Ditch enters concrete culvert inlet north of the Used Oil Containment Area (FA6). SWPPP Map 3 of 7 did not show/label the open ditch continuing into culvert pipe.
- SWPPP Maps did not show Santa Fe Ditch ditch/swale piped to area east of Red Dye Containment Area (FA14) on Map 3 or continuing south on Maps 4 and 5. SPCC Map 3 of 9 appears to incorrectly show Santa Fe Ditch piping as Industrial Wastewater (IW) piping to area east of aboveground storage of Red Dye Flammable Kerosene and Lubricity Combustible Corrosive (A9 and A10).
- Pollutant sources at dump stations near the West Bound and East Bound Fueling Rack/Areas were not shown/labeled on SWPPP Map 2 of 7 and SWPPP Map 5 of 7, respectively.
- Stockpiled earthen material (SP) associated with spills and liners for fuel storage were not shown/labeled on SWPPP or SPCC maps.
- Earthen stockpiles placed in drainage ditch/swale shown/labeled on SPCC Map 4 of 9 where not shown/labeled on SWPPP Map 4 of 7.
- SPCC Map 4 of 9 shows/labels what appeared to be a retention basin as infiltration / evaporation structure; however, SWPPP Map 4 of 7 shows this structure as a much larger area as a detention basin. Use of the terms "retention" and "detention" may need to be defined/clarified in SWPPP and/or maps.
- SPCC Map 3 of 9 did not show/label the storm sewer (ST) and associated inlets shown/labeled on SWPPP Map 3 of 7.
- SPCC Map 6 of 9 shows/labels Fueling Areas (FA6, FA7, FA8) which are not included in SWPPP Map 6 of 7 or within the area of industrial activity shown on SWPPP Map 6 of 7. Direction of flow from FA6, FA7 and FA8 is not shown on SPCC Map 6 of 9.

Additional notes on the comparison of SWPPP and SPCC maps are provided on photo log.

NPDES Industrial Storm Water Checklist (MSGP)

Continued

Available Spill Information from NMED and NRC

The facility's SWPPP indicated that there were no spills three years prior to the effective date of the permit. The SWPPP was annotated with spills occurring on July 5, 2018 (500-100 gallons water/oily water) and August 1, 2018 (100 to 150 gallons oily water at retention basin). The following is a summary of information of spills at the facility in NMED's Environmental Notification Tracking System (ENTS) database since 2014 (*volume in NMED reports may be based on preliminary, not updated information*):

NMED	Date	Summary
#13154	7/5/2018	Approximately 500 gallons mixed oil and diesel from railcar
#12727	10/5/2017	80 gallons diesel spill from overfilling a cargo tanker
#12249	7/29/2016	2 gallons of diesel on a concrete area
#10930	4/27/2014	Estimated 4,500 gallons from train departing east off Fuel Pad 1

A review of National Response Center (NRC) annual reports for 2017 (Source <http://nrc.uscg.mil/>) included the following incident:

NRC	Date	Summary
#1178830	5/19/2017	600 gallons diesel fuel into containment area from the rail yard fueling equipment

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)		
<u>General</u>	Notes:	
Routine Facility Inspections		Routine Facility Inspection Report dated 6/13/2018 contained in the SWPPP binders was not signed/certified/dated. Based on information from permittee representatives, inspection reports are not signed electronically.
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<div style="display: flex; align-items: center;"> <input checked="" type="checkbox"/> N </div> <p>N = Not documented for all activities of fuel contractor. An area utilized by fuel contractor's equipment storage / empty tankers described by permittee representatives was observed. The facility's SWPPP inspector described that this area adjacent to the open ditch, MRGCD facility Santa Fe Ditch was not inspected. Responsibilities for inspection of some fuel contractor storage areas and associated equipment appears needed in SWPPP, including SWPPP Site Maps (see Part 8.P.5 for additional inspection areas that include storage areas for vehicles and equipment awaiting maintenance).</p>
Are inspections documented, including: <ul style="list-style-type: none"> Date and time Name and signature of inspector Weather information and a description of discharge occurring at the time of the inspection Previously unidentified discharges from site Control measures needing maintenance or repairs Failed control measures that need replacement Incidents of noncompliance observed Additional control measures needed. 	<input checked="" type="checkbox"/> Y	N
Exceptions, including (see 3.1.1): <ul style="list-style-type: none"> Inactive and unstaffed sites 	Y	N
Quarterly Visual Assessment		
Are quarterly visual assessments conducted?	<input checked="" type="checkbox"/> Y	N

NPDES Industrial Storm Water Checklist (MSGP)

<p>Does the assessment consist of a sample collected:</p> <ul style="list-style-type: none">• Within the first 30 minutes of discharge• On discharges that occur at least 72 hours (3 days) from the previous discharge• Collected in a clean, clear glass or plastic container.	<div><input checked="" type="checkbox"/> Y</div>	<div><input type="checkbox"/> N</div>	
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NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
<p>Are assessments documented, including:</p> <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. 	Y	<input checked="" type="checkbox"/> N	<p>7/13/2018 visual assessment report did not indicate that sample was collected w/30 minutes for Outfall 001. As discussed above, location of Outfall 001 on 7/13/18 is not clearly documented since there are three outfalls shown/labeled on SPCC Map.</p> <p>7/29/2017 visual assessment report signed 10/19/17 described Outfall 002 as having yellow color and few settle solids. Probable sources not documented.</p>
<p>Exceptions, including (see 3.2.3):</p> <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.2.5.3) • Inactive and unstaffed sites. 	Y	N	Not applicable

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	Not applicable
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	Not applicable
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	<input checked="" type="checkbox"/> N	<p>N = Based on USEPA databases, impaired monitoring is required.</p> <p><u>Additional Information:</u> USEPA ICIS / Envirofacts on-line search for the Facility indicate a requirement for annual monitoring for both E.coli bacteria and Temperature beginning January 16, 2016, and overdue submittal of electronic Discharge Monitoring Reports (DMRs).</p> <p>Permittee representatives indicated that they were not aware that USEPA required impaired water monitoring. No electronic Discharge Monitoring Reports (DMRs) were submitted.</p> <p>Permittee may contact USEPA (e.g., NPDESReporting @epa.gov, 866-352-7755 between 8 a.m.–5 p.m. ET) if there are any questions on monitoring requirements, submitting a changed NOI form, submitting DMRs, and DMR No Data Indicator (NODI), including “No Discharge” codes.</p>
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	Samples not collected / ot analyzed
Benchmark Monitoring			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> Within the first 30 minutes of discharge On discharges that occur at least 72 hours (3 days) from the previous discharge Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall Prior to commingling. 	Y	N	Not applicable
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	See note above

NPDES Industrial Storm Water Checklist (MSGP)

Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	See note above
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> • Make the necessary modifications • Continue quarterly monitoring • Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA • Natural background pollutant level documentation 	Y	N	See note above
Exceptions, including (see 6.1.5, 6.1.6 & 6.2.1.3): <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Snowmelt • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	Y	N	See note above
Effluent Limitations Monitoring (Sector A, C, D, E, J, K, L, O, S)			Not applicable
Sampled once per year?	Y	N	Not applicable
Follow-up requirements if discharge exceeds effluent limit (see 6.2.2.3)?	Y	N	Not applicable

NPDES Industrial Storm Water Checklist (MSGP)

Water Quality Based Effluent Limitations				
Does the facility discharge to water quality impaired waters?	Y	N		Facility's NOI describes indirect discharge to Rio Grande.
If TMDL exists, does the facility need to monitor?	Y	N		According to USEPA databases, impaired monitoring is required.
Is the facility monitoring all 303(d) pollutants in the first surface water to which they discharge?	Y	<input checked="" type="checkbox"/> N		According to USEPA databases, impaired monitoring is required.
Does the facility discharge to a CERCLA site?	Y	<input checked="" type="checkbox"/> N		
Additional monitoring required by EPA?	<input checked="" type="checkbox"/> Y	N		According to USEPA databases, impaired monitoring is required.
Reporting (Part 7) Information must be submitted using NeT for NOI, NEC, NOT and Annual Report.				<u>DMRs must be submitted using NetDMR</u>
<u>General</u>				Notes:
Is facility a new discharger or new source to water quality impaired waters? Has the facility submitted this information to EPA Region 6?	Y	N		Not applicable
If there was a facility exceedance under numeric effluent limitations, was a report submitted to EPA within 30 days?	Y	N		Not applicable
Did the facility submit benchmark or ELG monitoring through NetDMR?	Y	N		Not applicable
Did the facility submit Annual Reports to EPA through NeT? (Due January 30 of each year)	Y	<input checked="" type="checkbox"/> N		USEPA database indicates 2017 Annual Report due January 30, 2017 received February 28, 2017
If follow up monitoring per 6.2.2.3 exceeds a numeric limit, did the facility submit an Exceedance Report (paper) to EPA Region 6 in addition to reporting the monitoring data through NetDMR?	Y	N		Not applicable

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Facility control measures include curbing, secondary containment, maintains spill absorbents, drip pans/track pans, and part draining hoppers</p> <p>Uncovered parts, metal and brake storage occur throughout the facility.</p>
Good Housekeeping	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>Generally, the facility appeared orderly. Facility has control measures (trash dumpsters/containers, described trash pickup, inlet grates). Some trash, primarily plastic water bottles and paper cups, was observed on the ground, along facility fence, and at inlet and outlets. Many of the observed trash dumpsters/containers were not covered, did not have covers, or covers were left open. SWPPP did not discuss the need for drain hole plugs.</p>
Preventative maintenance	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Preventative maintenance and testing (e.g., fuel storage, sumps, industrial waste lines) conducted by on-site contractor was described by permittee representatives.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Facility has developed a Spill Prevention, Control, and Countermeasure (SPCC) Plan, and response plans. Signs to report spills were observed at fueling / fuel storage areas. Evidence of spills and staining was primarily at industrial wastewater (IW) pipe inlets or containment. Not all spills or overflows were immediately cleaned up in track pans and at a sanitary dump station.</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Some areas of the site were stabilized (e.g., asphalt pavement, concrete sidewalks, buildings). In portions of the site, runoff was contained in retention ponds and low areas of the facility. No scour was observed in the ditch below stormwater pipe outlets. Access roads on the east side of the facility are not paved. Water trucks used for dust control were observed at the facility. Some erosional features are near and appear associated with access roads. Some sediment accumulation was observed on paved areas (e.g., ATV vehicle and equipment maintenance area). and sediment and debris on pavement at the ATV vehicle and equipment maintenance area. Soil stabilizer was stored on site. Permittee representative described use of stabilizer in watering trucks. Stockpiled earthen material and other stockpiles did not have erosion or sediment structural controls and were not stabilized.</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Runoff from industrial activity enters storm sewer pipe inlets. Stormwater mixed with industrial wastewaters enters separate inlet, pipe system and sumps.</p> <p><u>Comment:</u> As previously discussed, label discrepancies are on the SWPPP and SPCC site maps. Given the numerous pipe and sump inlet grates at the facility, additional measures to ensure contractors and employees are aware of locations to minimize pollutants should be considered (e.g., Signage, Storm Drain Labeling)</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>Salt storage is contained and covered. One paper approximately 5 to 10 pound bag of salt observed at a concrete pad was slightly damaged. Additional measures for transporting or temporarily storing salt used at the facility (e.g., plastic containers) should be considered.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>Waste, garbage and debris control measures were observed. Numerous dumpsters and trash cans were on site. Permittee representatives described trash removal practices and yard clean up. Trash observed to be removed from locomotive cleaning was bagged. Most trash observed in dumpsters was bagged. Some trash cans were lined.</p> <p>Accumulated trash including plastic water bottles was observed. Throughout the facility, some dumpsters were not covered as described in SWPPP. Many waste cans were not covered / did not have lids as described in SWPPP.</p>
Evidence of non-storm water discharges	<p>There was no evidence of non-storm water discharge observed during the inspection. No vehicle/equipment wash or tank cleaning operations were observed on the day of this inspection.</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Generally, dust generation was observed to be minimal on the day of this inspection. Windspeeds were relatively low on the day of this inspection. Water trucks used for dust control were observed at the facility. Some dust generation from vehicle use of the unpaved road east of the tracks was observed. Some sediment accumulation was observed on paved areas.</p>

Notes on SWPPP Implementation and Sector Specific Requirements
<p>List and describe structural controls <i>(The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications)</i></p> <p>Spilled grease, oil and diesel fuel and precipitation runoff from three fueling areas is collected in track pans, flows in an underground pipeline network and/or stored in above-ground storage tanks to on-site oil/water separators. Hydrocarbon contaminated sediment accumulated in the track pans and oil/water separators is placed in concrete sludge drying beds prior to off-site disposal at a permitted facility. Liquids drained from the sludge drying beds are discharged to an oil/water separator. The separated water is discharged to two synthetically-lined evaporative lagoons. The separated grease, oil and fuel is pumped to storage tanks and transferred to an on-site rail tank car for recycling off-site.</p> <p>Not all control measures in Part 8.P.4.3 of the 2015 MSGP (e.g., storing vehicles and equipment indoors, roofing of storage areas, cleaning pavement surfaces to remove oil and grease) were observed in all industrial areas throughout the facility. Additional evaluation appears needed to determine where feasible.</p>

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1145 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: At the ATV vehicle and equipment maintenance area, trash containers are lined, but not covered. Arrow points to trash level above the top of the container.



**NMED/SWQB
Official Photograph Log
Photo # 2**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1148 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Arrow points to stormwater pipe outlet outside the fence at northeast corner of facility described as Outfall 003 in Facility's Notice of Intent (NOI); labeled Outfall 1 on SWPPP maps; and labeled Outfall 3 on SPCC maps. Below the pipe outlet, the sides of the open ditch, which is MRGCD facility Santa Fe Ditch, are lined. No scour below the pipe outlet was observed.



**NMED/SWQB
Official Photograph Log
Photo # 3**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1150 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Example of plastic bottle and trash debris inside fence in northeast corner of the facility. The direction of runoff from this area appears to the west toward the stormwater drain inlets, lift station, surge tank, then pipe outlet in Photo #3.



**NMED/SWQB
Official Photograph Log
Photo # 4**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1151 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: More examples of plastic trash and debris in the northeast portion of the facility. Arrow points to material stockpile. The open ditch, which is MRGCD Santa Fe Ditch, is below this area (not visible in photo). The direction of runoff from this area appears to the west toward the stormwater drain inlets, lift station, surge tank, then pipe outlet in Photo #2. It was not determined during this inspection if the trash, debris and material stockpile is from industrial activity, but drainage from this area would appear to mix with storm water drained from the ATV vehicle and equipment maintenance area at the stormwater drain inlets, lift station, surge tank, then pipe outlet shown in Photo #3.



**NMED/SWQB
Official Photograph Log
Photo # 5**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1213 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Example of trash dumpsters that were not covered at West Bound Fueling Facility Rack (FA1). Bagged trash in dumpsters may minimize wind blow trash at the facility. Some trash and staining was on ground at dumpsters. It was not determined during this inspection if the dumpsters are solely used as control measures for industrial activity.



**NMED/SWQB
Official Photograph Log
Photo # 6**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1223 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Example of accumulated fluids and sand in track pan at industrial area West Bound Fueling Facility Rack (FA1). On-site representatives described preventative maintenance and schedule to keep track pans unclogged. Arrows point to examples of stains on concrete outside track pan.



**NMED/SWQB
Official Photograph Log
Photo # 7**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1230 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Exposed sanitary dump station used to dispose of wastes from cleaning locomotives near West Bound Fueling Facility Rack (FA1). Spilled or overflowed chemicals were contained within a concrete berm, but not promptly cleaned up as described in SWPPP.



**NMED/SWQB
Official Photograph Log
Photo # 8**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1306 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Arrow points to sediment and trash accumulated in a concrete swale and associated inlet grate in the northwest corner of the facility near the driveway for the Depot (Building 5). It was not determined during this inspection where water entering this inlet would flow.

Additional Notes: Inlet is not shown on SWPPP Map 2 of 7 and is not in an area that has industrial activity. The entrance is used to access areas with industrial activity. Runoff from industrial activity storage and vessel locations near the West Bound Fueling Facility Rack/ Fueling Area (FA1 and FA2) is shown (by arrows) toward the inlet location on SPCC Map 2 of 7. SPCC Map 2 of 7 shows/labels stormwater piping north of this inlet that is connected to the stormwater lift station, then grate outlet in open ditch which is MRGCD facility Santa Fe Ditch shown in next photo.



**NMED/SWQB
Official Photograph Log
Photo # 9**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1435 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: In east portion of the facility, photo shows outlet grate set in concrete above open ditch, described as Outfall 002 or 2 on NOI, SWPPP, and SPCC. Permittee representatives described that flow from the grate overflows and enters the open ditch. Arrows point to erosion features on the slope to the outlet grate. The access road is above this location. Some debris was collected in grate. No substantial erosion or scour below the outlet was observed.



**NMED/SWQB
Official Photograph Log
Photo # 10**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1435 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Looking south-southeast along the east portion of the facility, course aggregate track ballast had been placed at erosion and/or low areas along edge of open ditch according to permittee representative. Some ballast was in bed of open ditch. Arrows point to erosion features at slope into open ditch. The open ditch, which is MRGCD facility Santa Fe Ditch, is adjacent to unpaved access road. This access road connects industrial activity maintenance areas to chemical and fuel storage and vessel locations on the east side of the facility.



**NMED/SWQB
Official Photograph Log
Photo # 11**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1452 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Spill from on-site contractor's vehicle east of Red Dye Containment Area (FA14). The truck's hood was up, but there were no employees observed in close proximity to the vehicle when this photo was taken. Drip pan (not visible in photo) did not contain fluids. Permittee representatives described that the vehicle was not in a designated area for maintenance.



**NMED/SWQB
Official Photograph Log
Photo # 12**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1453 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: The parking lot at the ATV vehicle and equipment maintenance area in the northeast portion of the facility was being milled and re-paved. Arrow points to asphalt milling stockpiles that were transported from the paving project to this location northeast of Red Dye Containment Area (FA14) at entrance from Jarales Road / Hwy 109. Concrete barriers are visible at entrance on SWPPP Page 3 of 7.

Additional Notes: Direction of surface flow (by arrows) shown on SPCC Map Page 3 of 9 over the low area with ponded water in the right side of this photo is not consistent with observed topography.



**NMED/SWQB
Official Photograph Log
Photo # 13**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1455 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Milling from the stockpile area shown in previous photo continues into and down the side of the open ditch where the culvert pipe shown in Photo #13 has an outlet east of Red Dye Containment Area (FA14). Arrow is the location of the culvert pipe outlet which is obscured by vegetation. Paper trash was observed in bed of Santa Fe Ditch.

Additional Notes: SWPPP Maps 3, 4 and 5 do not show/label the location of MRGCD facility Santa Fe Ditch from the culvert pipe inlet, pipe outlet, the continuing as open ditch / swale. SPCC Map 3 of 9 shows/labels the MRGCD facility Santa Fe Ditch from the approximate location of the culvert pipe inlet, thru to the culvert pipe outlet and open ditch as Industrial Wastewater (IW) pipe. SPCC Map 3 shows/labels the MRGCD facility Santa Fe Ditch continuing as IW pipe into ditch/swale.



**NMED/SWQB
Official Photograph Log
Photo # 14**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1500 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Arrows point to erosion features above vegetated MRGCD facility Santa Fe Ditch east of the access road east of the South Main Tank Farm (FA4).



**NMED/SWQB
Official Photograph Log
Photo # 15**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1500 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Stockpiled earthen material adjacent to MRGCD facility Santa Fe ditch. Concrete barrier (backstop) did not continue along length of stockpile.



**NMED/SWQB
Official Photograph Log
Photo # 16**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1500 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Vegetation in MRGCD facility Santa Fe Ditch. Arrow points to stockpiled earthen material adjacent to ditch/swale.



**NMED/SWQB
Official Photograph Log
Photo # 17**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1501 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Vegetation, including cattails, in MRGCD facility Santa Fe Ditch. Arrow points to slope of stockpiled earthen material adjacent to ditch/swale shown in previous photo.



**NMED/SWQB
Official Photograph Log
Photo # 18**

Photographer: Erin S. Trujillo

Date: 11/14/2018

Time: 1507 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Arrow points to example of shallow erosion feature on embankment of containment liner at southwest corner of above-ground fuel storage (South Main Tank Farm). Similar shallow erosional features were observed on west and south sides of the embankment.



**NMED/SWQB
Official Photograph Log
Photo # 19**

Photographer: Erin S. Trujillo

Date: 11/15/2018

Time: 1042 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Permittee representatives described that this stockpile on plastic sheeting included soils impacted by July/August oil/water separator release and over excavation to enlarge the impacted retention pond. Soils impacted by the August runoff from the oil/water separator release were not immediately disposed off-site.



**NMED/SWQB
Official Photograph Log
Photo # 20**

Photographer: Erin S. Trujillo

Date: 11/15/2018

Time: 1214 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Arrows point to erosion features from and near access road at MRGCD facility New Belen Wasteway.



**NMED/SWQB
Official Photograph Log
Photo # 21**

Photographer: Erin S. Trujillo

Date: 11/15/2018

Time: 1216 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Example of stains and inlet grates at oil aboveground storage tanks east of East Bound Fueling Facility (FA10 and FA5, respectively). Inlet grates are in a concrete swale or low area.

Additional Notes: SPCC Map 5 of 7 shows/labels underground piping, but industrial wastewater (IW) piping is not shown/labeled for area east and north of East Bond Fueling Facilities. IW piping is not shown on SWPPP Map 5 of 7.



**NMED/SWQB
Official Photograph Log
Photo # 22**

Photographer: Erin S. Trujillo

Date: 11/15/2018

Time: 1222 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Looking east-southeast at access road and MRGCD facility New Belen Wasteway from eastern end of Eastbound Fueling Facility (FA5).



**NMED/SWQB
Official Photograph Log
Photo # 23**

Photographer: Erin S. Trujillo

Date: 11/15/2018

Time: 1400 hours

City/County: Belen / Valencia County, New Mexico

State: New Mexico

Location: BNSF Railway Company, Belen Yard

Subject: Spilled or overflowed fluids were contained within track pan at maintenance area / inspection pit., but not promptly cleaned up as described in SWPPP.



Operator or Permittee Response

Shea, Erin S, NMENV

From: Lees, Domonic <Domonic.Lees@BNSF.com>
Sent: Tuesday, January 22, 2019 3:20 PM
To: Shea, Erin, NMENV
Subject: [EXT] comments regarding NMED NPDES inspections
Attachments: 20190110083504833 (002).pdf

Mrs. Trujillo,

Attached is BNSF's responses to the NMED NPDES permit inspection.

Domonic Lees
BNSF Railways
Manager Environmental Operations
Colorado/New Mexico/Arizona/El Paso
1624 1st Street NW, Albuquerque, NM 87102
Office: 505-767-6908
Cell: 505-269-5482
Fax: 505-767-6924

NPDES Industrial Storm Water Checklist (MSGP)

P Review			
General	Notes:		
Is the SWPPP completed prior to NOI issuance?	<input checked="" type="checkbox"/>	N	
Is the NOI and acknowledgment from EPA?	<input checked="" type="checkbox"/>	N	
Is the permit language?	<input checked="" type="checkbox"/>	N	
Are copies of inspection reports/all documentation been retained as the SWPPP for 3 years from date coverage expires?	Y	N	Not expired. See notes below for Endangered Species Act.
Does the SWPPP contain a /certified statement indicating that the facility is inactive and unstaffed, and there are no industrial materials or wastes exposed to precipitation, in accordance with the substantive requirements in 40 CFR 136.3(g)(4)(iii)?	Y	N	Not applicable
Does the SWPPP include copies of pertinent parts of other documents (e.g., permits) referenced in the SWPPP?	<input checked="" type="checkbox"/>	N	Permittee representatives provided Spill Prevention, Control, and Countermeasure (SPCC) Plan, including Site Maps Final 05/19/2018
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	N = Not kept with SWPPP. See notes below.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under NEPA (New England)?	Y	N	Not applicable
Do "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	
Is storm water pollution prevention identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are storm water pollution prevention responsibilities identified?	<input checked="" type="checkbox"/>	N	
Does the SWPPP provide a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	

Summary of Comments on 20190110083504833 (002).pdf

Page: 7

Number: 1 Author: B022408 Subject: Sticky Note Date: 1/11/2019 9:15:45 AM
Located in Appendix F. US Fish and wildlife Threatened and Endangered species report indicates no critical habitats affected or impacted by the project area or property boundary.

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Is there a general location map (e.g., quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm discharges?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the size of the facility in acres?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<u>Comment:</u> Not all impervious surfaces were easy to discern in the aerial imagery due to the scale of the printed site maps.
Does the site map contain directions of water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Site Maps did not indicate direction of surface flow, except for portions of ditch/swale. See notes below. SWPPP did not include Drainage Area Site Map (see Part 8.P.4.1 of the 2015 MSGP). See notes below.
Does the site map contain locations of existing structural control measures?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	See notes below
Does the site map contain locations of receiving waters in the immediate vicinity of the facility, indicating if any waters are impaired, and if so, whether the waters have TMDLs established for them?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	See notes below / Federal CWA jurisdictional determination was not conducted <u>Additional Information:</u> SWPPP Site Maps indicated portions of ditch. Rio Grande with impairments and Total Maximum Daily Load (TMDL) is not in immediate vicinity. Facility General Location Map shows Rio Grande, but not impairments or TMDL.
Does the site map contain locations of storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Site Maps did not contain all or did not contain correctly labeled/symbols for all inlets, pipes, drains, irrigation, and ditch/swale. See notes below.
Does the site map contain locations of potential pollutants and significant spills identified under Part 5.2.3.2?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Site Maps did not contain location of stockpiled earthen material, sanitary dump stations, portable toilets
Does the site map contain locations of significant spills or leaks identified under Part 5.2.3.3 have occurred?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Additional information and clarification in SWPPP appears needed. See notes below.
Does the site map contain locations of storm water monitoring points?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	See notes below
Does the site map contain locations of water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	See notes below
Does the site map contain municipal sanitary storm sewers and where they discharge to them?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Not applicable
Does the site map contain locations and descriptions of all non-storm water discharges?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	N = Not documented for allowable fire hydrant flushing/testing (see Part 1.1.3.1 of 2015 MSGP).

Number: 1	Author: B022408	Subject: Sticky Note	Date: 1/11/2019 9:16:52 AM
Will revise map to include flow directions			
Number: 2	Author: B022408	Subject: Sticky Note	Date: 1/11/2019 9:21:43 AM
Given conversation with Mr. Washburn from MRGCD, ditch on east side of property identified on map as canal to sanchez drain is not maintained by MRGCD and has subsequently filled in over the years, drainage from east side of property effectively stays on the property by effectively terminating on east side of property just south of our main tank farms.			
Number: 3	Author: B022408	Subject: Sticky Note	Date: 1/11/2019 9:28:09 AM
Review of SWPPP maps shows all storm drainage piping and stormwater inlets identified, both of two outfalls are labeled. canal to sanchez drainage is identified on east side of property. Sanchez Canal is identified and Belen wasteway ditch is identified on south part of operational boundary. Industrial and non-industrial areas identified, Storage tanks identified on map. Please clarify what is meant by "SWPPP map did not contain all or did not contain correctly labeled/symbols for all inlets, pipes, drains, irrigation, and ditch/swales"?			
Number: 4	Author: B022408	Subject: Sticky Note	Date: 1/11/2019 9:28:40 AM
Will revise map to show			
Number: 5	Author: B022408	Subject: Sticky Note	Date: 1/11/2019 2:27:57 PM
Will revise map			

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	<input checked="" type="checkbox"/> N	Location of controls for areas described as "Throughout facility" in SWPPP is not specific and does not appear sufficient for unpaved roads, ditches, stockpiled earthen material, stockpiled earthen material impacted by spills, flow velocity, dust control agents (see Part 2.1.2.5 Erosion and Sediment Controls of 2015 MSGP).
Does the facility stabilize exposed areas, maintain runoff using structural and non-structural control measures, minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	<input checked="" type="checkbox"/> N	Y = paved areas, soil stabilization, retention ponds, low areas / infiltration areas N = stockpiled earthen material
Does the facility place flow velocity reduction devices at discharge points and within outfall channels necessary to reduce erosion and settle out pollutants?	Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> N = Location of control described as "Throughout facility" is not specific.
Does the facility store salt at this facility, are salts enclosed or covered? Does the facility implement appropriate measures (good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing salts from the pile?	<input checked="" type="checkbox"/> Y	N	
Employee Training – is there a scheduled annual (at least annually) employee training?	Y	<input checked="" type="checkbox"/> N	Y = BNSF employees annually N = Not documented for on-site contractor employees
Does the facility maintain covering both the specific control measures used to achieve the discharge limits in Part 2 and monitoring, documentation, planning, reporting, and maintenance requirements in other parts of the permit?	Y	<input checked="" type="checkbox"/> N	N = Not documented for on-site contractor employees (See Parts 2.1.2.8 and 8.P.3.2 of 2015 MSGP)
Does the facility ensure that waste, sludge, and floatable debris are not discharged to receiving waters by exposing exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	N	Described in SWPPP. See notes below on implementation.
Does the facility minimize generation of and off-site tracking of raw, final, or intermediate materials?	<input checked="" type="checkbox"/> Y	N	Described in SWPPP. See notes below on implementation.
Does the facility eliminate non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	N	

Number: 1 Author: B022408 Subject: Sticky Note Date: 1/11/2019 2:31:19 PM

Terrain is relatively flat throughout facility, locations along flow channels where excessive erosion was observed during routine facility inspections have had rip rap placed to limit erosion into flow channels.